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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

### This Document Relates to:

## ALL ACTIONS

**DECLARATION OF VERONICA  
GROMADA IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC., RASIER, LLC, AND RASIER-CA,  
LLC'S ADMINISTRATIVE MOTION TO  
SEAL**

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor

I, Veronica Gromada having personal knowledge of the following state:

1. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am a member in good standing of the Bar of the State of Texas and admitted *pro hac vice* in this litigation. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so.

2. I respectfully submit this declaration in support of Uber's administrative motion to seal, dated September 6, 2024.

3. I have reviewed Exhibit B to my declaration in support of Uber's letter brief regarding Plaintiffs' subpoena to Ballard Partners. This exhibit consists of three contracts between Ballard Partners and Uber and a termination letter. It contains confidential information and terms regarding Uber's contractual and business relationship with Ballard Partners. The disclosure of this document could harm Uber's marketplace standing and cause undue harm if publicly disseminated.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 6, 2024.

By: /s/ *Veronica Gromada*

Veronica Gromada